

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**THE MUNICIPALITY OF SAN JUAN
PUERTO RICO,**

Plaintiff,

v.

EXXON MOBIL CORP. et al.,

Defendants.

Case No. 3:23-cv-01608-ADC

**DEFENDANTS' URGENT MOTION RENEWING REQUEST FOR LEAVE TO FILE
JOINT REPLIES IN EXCESS OF PAGE LIMIT AND FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COME NOW Defendants Occidental Petroleum Corporation, Exxon Mobil Corp., Chevron Corp., ConocoPhillips, and Motiva Enterprises LLC (collectively, the “Domestic Defendants”); BHP Group Limited, BP p.l.c. and Shell plc (collectively, the “Foreign Defendants”); and Rio Tinto plc (collectively, “Defendants”), through their respective counsel, respectfully state and pray as follows:

1. On April 21, 2025, Defendants filed a *Motion for Leave to File Replies in Excess of Page Limit and for an Extension of Time* (Dkt. No. 179, the “Motion for Leave”).

2. In the Motion for Leave, Defendants seek authorization to file, by **May 12, 2025**: (i) a single Joint Reply, not exceeding 35 pages, in support of their Motions to Dismiss for Failure to State a Claim, (ii) a single Joint Reply, not exceeding 15 pages, in support of their Motions to Dismiss for Lack of Jurisdiction, (iii) a single Joint Reply, not exceeding 10 pages, in support of their Motion for Judicial Notice, and (iv) to the extent needed, individual Replies, not exceeding 10 pages each, in support of their respective individual Motions to Dismiss. *See id.*

3. Defendants respectfully submit that the filing of Joint Replies by all Defendants would ease the burden on the Court and be more efficient than the filing of separate Joint Replies

by the Domestic and Foreign Defendants. To accommodate these joint filings, the Motion for Leave seeks leave to file the Joint Replies in excess of the page limit and an extension until May 12, 2025 to file all Replies.

4. The Motion for Leave remains *sub judice*. Thus, the current deadline for the Domestic Defendants to file their Replies is **April 30, 2025**, Dkt. No. 172, and the current deadline for the Foreign Defendants and Rio Tinto to file their Replies is **May 5, 2025**, Dkt. No. 163.

5. Because of the imminence of these deadlines, Defendants respectfully renew the requests in the Motion for Leave.

6. Defendants respectfully submit that granting said requests would not cause any additional burden on the Court or significantly delay the resolution of the Motions to Dismiss and Motion for Judicial Notice.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order granting them leave to file:

- a) a single Joint Reply, not exceeding 35 pages, in support of their Motions to Dismiss for Failure to State a Claim;
- b) a single Joint Reply, not exceeding 15 pages, in support of their Motions to Dismiss for Lack of Jurisdiction;
- c) a single Joint Reply, not exceeding 10 pages, in support of their Motion for Judicial Notice;
- d) to the extent needed, individual Replies, not exceeding 10 pages each, in support of their respective individual Motions to Dismiss; and
- e) all Replies by May 12, 2025.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 24th day of April 2025.

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CERTIFICATE OF SERVICE

I hereby certify that, on the above date, I filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel record who are CM/ECF system participants at their corresponding e-mail addresses.

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